

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

CASE NO.: 1:23-cv-23791-FAM

CHRISTON KNOWLES,

Plaintiff,

v.

PRESTIGE AUTO MIAMI LLC, et. al.,

Defendants.

**DEFENDANT CIG FINANCIAL, LLC'S MOTION FOR EXTENSION OF TIME IN
WHICH TO RESPOND TO COMPLAINT**

Defendant CIG Financial, LLC ("Defendant") hereby move for a thirty (30) day enlargement of time in which to respond to the Complaint in this cause and state the following as grounds therefor:

1. Defendant was served with the Complaint on or about September 26, 2023.
2. Defendant CIG Financial, LLC's response to the Complaint in this cause is due October 26, 2023.
3. Defendant asks for an extension of time in which to respond to the Complaint for several reasons.
4. First, the undersigned was recently retained by the Defendant.
5. Second, counsel, Carlos F. Rodriguez, who is writing a substantial portion of the response to the Complaint, has not had an opportunity to review the Complaint and prepare a response. As such, Defendant requests a brief, thirty (30) day extension to respond to Plaintiff's Complaint.

6. Plaintiff will not be prejudiced by allowing the undersigned additional time to review the Complaint and prepare their response.

7. The undersigned makes this motion in good faith and not for purposes of delay in any way.

WHEREFORE, Defendant CIG Financial, LLC requests a thirty (30) day enlargement of time, through and including November 27, 2023, in which to respond to the Complaint by pleading or any motion authorized by the Federal Rules of Civil Procedure or applicable law.

Dated: October 26, 2023

Respectfully submitted,
/s/ Carlos F. Rodriguez
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Florida Bar No. 97655
ERRA LAW
2601 S. Bayshore Dr., 18th Floor
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic filing with the Clerk of the court via CM/ECF, which will send notice of electronic filing to all counsel of record, and by regular mail to the parties listed in the Service List for manual service on this 26th day of October, 2023.

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BY: /s/ Carlos F. Rodriguez
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